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March 12, 1993

**MEMORANDUM TO:** Anne V. Hiller, Project Manager, Superfund Branch,  
Division of Air and Waste Management

**FROM:** Faye L. Stocum, Archaeologist *FLS*

**SUBJECT:** Standard Chlorine of Delaware Superfund Site-Draft Feasibility Study and Draft Phase IA Archaeological Survey Reports.

I have received and reviewed the above cited documents. I reviewed the draft Feasibility Study (FS) with particular attention given to how each the remedial alternatives could impact archaeological resources if implemented. This is the focal issue of the compliance with the ARARs; most particularly with Section 106 of the National Historic Preservation Act of 1966, as amended. It was with that perspective that I then reviewed the draft report entitled Standard Chlorine of Delaware Inc. Phase IA Cultural Resource Assessment Final Report prepared by Nagle et. al January 1993. Based on my review of the Nagle et.al report, it will not be possible to determine whether compliance with Section 106 will be achieved. The results of a Phase IA archaeological survey, by its very nature, will not provide the necessary information required to complete this aspect of the Feasibility Study. In this particular case, since a known prehistoric site, 7NC-E-106, is present and the possibility exists that it has some integrity (not completely destroyed as a result of the initial remedial response activities) and there were areas defined as having archaeological sensitivity (as either other sites or as extensions of the known site), it is not possible to determine whether the remedial alternatives presented in the FS will adversely affect or impact significant archaeological site data. The recommendations of avoidance as presented in the Recommendations Section of this report cannot be considered viable to complete the Section 106 review process for this project. At minimum, a Phase IB Field Reconnaissance Survey is needed. Based on the results of this level of effort, the need for initiating a Phase II or Intensive Level Survey will be determined.

Additionally, pursuant to my review of the Phase IA report, I must also advise you, Standard Chlorine and EPA that this report does not meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (49 FR 44716). Because it does not meet these federal standards, we

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cannot accept this as a final report. I have prepared a detailed list of comments which the consultant will have to address in revising this report. Once the federal standards have been met, we will be able to accept a final report. I suggest the consultant review these comments and, if needed, call me to discuss them. In the interim, I recommend that a Phase 1B proposal be prepared for our review and approval in order to provide the requisite information needed to continue the Section 106 review process.

Please do not hesitate to contact me if you have any questions or if I can be of any further assistance. Thank you.

Enclosure

cc: ~~Karl Kalbacher~~  
N.V. Ramin  
~~Katherine Lose~~  
Paul Johnston

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